

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:)	CHAPTER 7
)	
ROBERT STORM,)	CASE NO. 23-55028-LRC
)	
DEBTOR.)	

**NOTICE OF MOTION FOR EXTENSION OF DEADLINE, DEADLINE TO
OBJECT AND FOR HEARING**

The United States Trustee has filed a Second Motion For Extension of Deadline on January 29, 2024. Pursuant to Third Amended and Restated General Order 24-2018, the Court may consider this matter without further notice or a hearing if no party in interest files a response or objection within twenty-one (21) days from the date of service of this notice. **If you object to the relief requested in this pleading, you must timely file your objection with the Bankruptcy Clerk at United States Bankruptcy Court, Richard Russell Federal Building and United States Courthouse, 75 Ted Turner Drive, S.W., Suite 1340, Atlanta, Georgia 30303; and serve a copy on the movant's attorney, Jonathan S. Adams, Richard Russell Federal Building, 75 Ted Turner Drive, S.W., Suite 362, Atlanta Georgia 30303; and any other appropriate persons by the objection deadline.** The response or objection must explain your position and be actually received by the Bankruptcy Clerk within the required time.

A hearing on the pleading has been scheduled for **February 29, 2024**. The Court will hold a hearing on the Second Motion For Extension of Deadline **at 10:15 A.M. on February 29, 2024** in Courtroom 1204, United States Courthouse, 75 Ted Turner Drive, S.W., Atlanta, Georgia 30303, which may be attended in person or via the Court's Virtual Hearing Room. You may join the Virtual Hearing Room through the "Dial-In and Virtual Bankruptcy Hearing Information" link at the top of the homepage on the Court's website, www.ganb.uscourts.gov, or the link on the judge's webpage, which can also be found on

the Court's website. Please also review the "Hearing Information" tab on the judge's webpage for further information about the hearing. You should be prepared to appear at the hearing via video, but you may leave your camera in the off position until the Court instructs otherwise. Unrepresented persons who do not have video capability may use the telephone dial-in information on the judge's webpage.

If an objection is timely filed and served, the hearing will proceed as scheduled. **If you do not file a response or objection within the time permitted, the Court may grant the relief requested without further notice or hearing**, provided that an order approving the relief requested is entered at least one business day prior to the scheduled hearing. If no objection is timely filed, but no order is entered granting the relief requested at least one business day prior to the hearing, the hearing will be held at the time and place scheduled.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this Bankruptcy Case. If you do not have an attorney, you may wish to consult one.

Dated: January 29, 2024

MARY IDA TOWNSON
UNITED STATES TRUSTEE
REGION 21

/s/ Jonathan S. Adams
JONATHAN S. ADAMS
Trial Attorney
Georgia Bar Number 979073
United States Department of Justice
Office of the United States Trustee
362 Richard B. Russell Building
75 Ted Turner Drive, SW
Atlanta, Georgia 30303
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**UNITED STATES BANKRUPTCY COURT
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IN RE:)	CHAPTER 7
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SECOND MOTION FOR EXTENSION OF DEADLINE

Mary Ida Townson, United States Trustee for Region 21 (the “United States Trustee”), requests that the Court extend the deadline under Federal Rule of Bankruptcy Procedure 4004 to file an objection to discharge pursuant to Bankruptcy Code section 727. In support of this motion, the United States Trustee shows as follows.

1.

On May 31, 2023, three creditors filed an involuntary petition against Robert Storm (hereinafter the “Debtor”). On July 14, 2023, the Court entered an Order for Relief under Chapter 7 of the Bankruptcy Code pursuant to Federal Rule of Bankruptcy Procedure 1013.

2.

Jason L. Pettie was appointed Chapter 7 Trustee.

3.

The Meeting of Creditors was initially scheduled for August 30, 2023, but was rescheduled to September 14, 2023 on account of Debtor’s failure to appear. The Meeting of Creditors was held and concluded on September 14, 2023.

4.

Federal Rule of Bankruptcy Procedure 4004(a) provides that in a chapter 7 case, a complaint objecting to discharge must be filed no later than 60 days after the first date set for the section 341(a) meeting of creditors.

5.

The initial deadline for filing a complaint under section 727 was October 30, 2023. On October 30, 2023, the United States Trustee filed a Motion for Extension of Deadline, requesting an extension of the deadline to file an objection to discharge pursuant to 11 U.S.C. Section 727. (Dkt. No. 87) On November 15, 2024, the Court entered a Consent Order, extending the deadline for the United States Trustee to file an objection to discharge pursuant to 11 U.S.C. Section 727 to January 29, 2024. (Dkt. No. 97)

6.

Federal Rule of Bankruptcy Procedure 4004(b)(1) provides that “on motion of any party in interest, after notice and a hearing, the court may for cause extend the deadline to object to discharge.”

7.

The United States Trustee wishes to further review this case under section 727 to determine whether there is a basis for filing a complaint to deny discharge. The United States Trustee has requested documentation from the Debtor to complete her review, but to date, the Debtor has not yet provided the United States Trustee with all of the requested documentation. In addition, the United States Trustee wishes to conduct a Rule

2004 Examination of the Debtor, regarding certain pre-petition transfers and business activity. The United States Trustee requests an extension of the deadline to file an Objection to Discharge, so that she may obtain the necessary documentation and information from the Debtor.

8.

Pursuant to communication with counsel for Debtor, the United States Trustee believes that Debtor will consent to the relief requested in this motion.

WHEREFORE, the United States Trustee requests the Court enter an order extending the deadline for the United States Trustee to file a complaint to deny discharge under section 727 to March 29, 2024.

MARY IDA TOWNSON
United States Trustee, Region 21

s/ Jonathan S. Adams

Jonathan S. Adams
Georgia Bar Number 979073
United States Department of Justice
Office of the United States Trustee
362 Richard B. Russell Building
75 Ted Turner Drive, SW
Atlanta, Georgia 30303
(404) 331-4438
Jonathan.S.Adams@usdoj.gov

CERTIFICATE OF SERVICE

This is to certify that I have on this day electronically filed the foregoing *Second Motion for Extension of Deadline and Notice of Pleading, Deadline to Object and for Hearing* using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case filing program.

- **Rosemary S. Armstrong** rarmstrong@armstrongnix.com
- **Maxwell William Bowen** max@roblgroup.com
- **Peter B. Bricks** pbricks@gmail.com, peter@brickslaw.com
- **Joseph J. Burton** jburton@armstrongnix.com
- **Jon A. Gottlieb** jong@lawfg.com, stellac@lawfg.com
- **Brian K. Jordan** ecfganb@aldridgepite.com, bjordan@ecf.inforuptcy.com
- **Richard B. Maner** rmaner@rbmlegal.com, kbloodworth@rbmlegal.com
- **Jacob A. Maurer** jmaurer@brawwlaw.com, cbastos@brawwlaw.com
- **Jason L. Pettie** jpettie@taylorenghish.com, GA25@ecfcbis.com; jp@trustesolutions.net
- **Michael D. Robl** michael@roblgroup.com, max@roblgroup.com, larena@roblgroup.com
- **Thomas Rosseland** trosseland@brawwlaw.com
- **Daniel T Seelos** dseelos@kkgpc.com, sschuler@kkgpc.com
- **Kenneth A. Shapiro** ken@mitchellshapiro.com, frank@mitchellshapiro.com

I further certify that on this day, I caused a copy of this document to be served via United States First Class Mail, with adequate postage prepaid on the following parties at the address shown for each.

Robert Storm
94 Rosehill Court
St. Augustine, FL 32092

Dated: January 29, 2024.

s/ Jonathan S. Adams
Jonathan S. Adams
Georgia Bar No. 979073
United States Department of Justice
Office of the United States Trustee
362 Richard B. Russell Building
75 Ted Turner Drive, SW
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